

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
v.) Case Nos. 3:09-cr-00218-1
REZA KOUSHKBAGHI) 3:13-cr-00100-1
) CHIEF JUDGE HAYNES

MOTION TO RELEASE BAIL FUNDS

The Defendant, Reza Koushbaghi, by and through counsel, hereby moves this Honorable Court to direct the Clerk of Court to do the following: (a) close out the interest-bearing account with Bank of America, that was created pursuant to the Investment Order entered herein (Doc # 202), (b) deposit the sum received from the bank account into the registry of this Court, and (c) draw a check on the funds on deposit in the registry of this Court in the principal amount of \$17,000.00 plus all interest earned on the account less the Clerk's registry fee of 10% of the interest earned on the account payable to Mehriyeh Sadkhosravi, and (d) mail said check to the address shown on the form sent to the Administrative Manager of the Clerk's Office Finance Department. The payee's address and social security number are on file with the Clerk's Office.

The Defendant has discussed the matter with Assistant United States Attorney, Blanche B. Cook and the government has no opposition to the release of bail funds.

Respectfully submitted this 1st day of May, 2014.

s/ Charles D. Buckholts
Charles D. Buckholts, BPR #019318
Attorney for Defendant
2400 Crestmoor Rd.
Nashville, TN 37215
(615) 386-7118
chuck@buckholtslaw.com